

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

Brian J. Miller	:	Case No.19-21844
Anita M. Osborne	:	Chapter 13
Debtor(s)	:	
Dollar Bank, FSB	:	
Movant(s)	:	Related to Document #51
	:	Hearing Date: 4/1/20 at 10:00 a.m.
vs.	:	
Brian J. Miller	:	
Anita M. Osborne	:	
Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY AS TO  
465 FERNHILL AVENUE, PITTSBURGH, PA 15226

RONDA J. WINNECOUR, Chapter 13 Trustee, responds as follows:

1. Dollar Bank, FSB requests Relief from Stay with regard to the properties located at 465 Fernhill Avenue, Pittsburgh, PA 15226.
2. Debtors' Schedule D lists the value of the property as \$120,000.00. The amount of Movant's first secured claim is listed as \$50,000.00 and the amount of Movant's second secured claim is listed as \$10,855.00. Other claims against the property include:
  - a. Allegheny County Treasurer - \$900.00
  - b. City & School District of Pittsburgh - \$3,200.00
3. Schedule C lists an exemption of \$25,150.00 for the property.
4. Therefore, substantial equity may exist in the properties, which should be preserved.

WHEREFORE, the Trustee respectfully requests that the Motion be denied.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: March 6, 2020

By: /s/ Owen W. Katz  
Owen W. Katz, PA I.D. 36473  
Attorney for Chapter 13 Trustee  
US Steel Tower, Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
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CERTIFICATE OF SERVICE

I, the undersigned, certify that, in addition to ECF service on parties having entered their appearance in this case, I served or caused to be served on March 6, 2020, the foregoing document upon each of the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Office of the United States Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222-3721

Brian J. Miller  
Anita M. Osborne  
465 Fernhill Avenue  
Pittsburgh, PA 15226

Kenneth Steidl, Esquire  
Steidl & Steinberg  
Gulf Tower, Suite 2830  
707 Grant Street  
Pittsburgh, PA 15219

David W. Raphael, Esquire  
One Gateway Center, 9<sup>th</sup> Floor  
Pittsburgh, PA 15222

/s/Rosa Richard  
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